

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES

v.

SAMUEL SULLIVAN, JR.

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Case No. TDC-21-460

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**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE
SENTENCING MEMORANDA**

The Defendant, Samuel Sullivan, Jr., by and through his counsel, Michael E. Lawlor, Adam C. Demetriou, and Brennan, McKenna & Lawlor, Chtd., respectfully requests that this Honorable Court extend the deadline for the filing of sentencing memoranda in this case through September 13, 2023. In support of this Motion, counsel state as follows:

1. On March 30, 2023, Mr. Sullivan entered a plea of guilty in this case. (Plea Agreement, ECF No. 64.) Mr. Sullivan also admitted to violations of supervised release in case number TDC-10-223.

2. On June 14, 2023, this Court continued the sentencing hearing in this matter to September 20, 2023.

3. Under this Court's Sentencing Order, sentencing memoranda are due to be filed no later than 14 days before a sentencing hearing. Accordingly, the parties' sentencing memoranda are due tomorrow, September 6, 2023.

4. The undersigned counsel are working diligently to complete the sentencing memorandum in this case. However, due to the press of other deadlines, including a deadline for filing an opening brief in the Appellate Court of Maryland, the undersigned counsel request a modest extension of the deadline for filing the sentencing memorandum in this case.

5. This Motion is unopposed. The undersigned counsel have conferred with AUSA Michael Morgan, who has indicated that the Government does not oppose the requested extension.

6. For these reasons, Mr. Sullivan respectfully requests that this Court extend the current deadline for the parties to file sentencing memoranda through September 13, 2023.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, September 5, 2023, a copy of the foregoing was sent via ECF to the United States Attorney's Office for the District of Maryland.

/s/

Michael E. Lawlor